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Margaret Frankiewicz in Kooser et al. v.  
Facebook Inc. et al, 18-cv-2009-YGR*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

LAUREN PRICE, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

FACEBOOK, INC, and CAMBRIDGE  
ANALYTICA, LLC

Defendants.

**CASE NO. 3:18-CV-01732-VC**

**PLAINTIFF DEBRA KOOSER AND  
MARGARET FRANKIEWICZ'S  
RESPONSE IN SUPPORT OF ORDER  
OF REFERRAL TO DETERMINE  
WHETHER CASES ARE RELATED**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Pursuant to Civil Local Rule 3-12(e) and 7-11(b), Plaintiffs Debra Kooser and Margaret Frankiewicz in *Kooser, et al v. Facebook, Inc., et al.*, Case No. 4:18-cv-2009-YGR (N.D. Cal., filed April 2, 2018) ("Kooser Action"), hereby files their Response in Support of Judge Rogers' Order of Referral to Determine Whether Cases Are Related. (Dkt. 30).

Plaintiffs Kooser and Frankiewicz agree that their action should be related to the six cases in this District, *Price v. Facebook, Inc., et al.*, Case No. 3:18-cv-01732 (filed March 20, 2018) ("Price Action"), *Rubin v. Facebook, Inc., et al*, Case No. 18-cv-01852 (filed March

26, 2018) (“Rubin Action”), *Gennock et al. v. Facebook, Inc., et al.*, Case No. 4:18-cv-01891 (filed March 27, 2018) (“Gennock Action”), *O’Kelly v. Facebook, Inc., et al.*, Case No. 3:18-cv-01915 (filed March 28, 2018) (“O’Kelly Action”), *Beiner, et al. v. Facebook, Inc., et al.*, No. 3:18-cv-1953 (filed March 29, 2018) (“Beiner Action”); and *Haslinger v. Facebook, Inc., et al.*, Case No. 4:18-cv-01984-YGR (filed March 30, 2018) (“Haslinger Action”) (collectively “The Actions”).

The Actions all concern substantially the same parties, property, transaction or event, in that they all concern the massive unauthorized harvesting of Facebook user’s personal information by Cambridge Analytica LLC (“Cambridge”) and used for Facebook and Cambridge’s financial benefit. *See* Local Rule 3-12(a)(1).

If the Kooser Action is not related, there will certainly be duplication of labor and expense and a risk of conflicting results, as The Actions will all seek discovery into the same underlying conduct of Defendants Facebook and Cambridge and relief in each action will be based on that conduct. *See* Civ. L.R. 3-12(a)(2).

Accordingly, the Court should relate The Kooser Action with The Actions and assign The Kooser Action to this Court’s calendar under Civil Local Rule 3-12(f).

Dated: April 13, 2018

/s/ Joshua H. Watson  
Joshua H. Watson

*Attorney for Plaintiffs and the Class*